

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

IN THE MATTER OF:	Docket No. V-W-90-C-051
Albion-Sheridan Township Landfill ) 13355 29-Mile Road ) Albion, Michigan )	
Respondent:	
Robert Seiler )	

## AFFIDAVIT OF THEODORE LUTZKE

- 1. My name is Theodore Lutzke.
- 2. During the years 19<u>47</u> to 19<u>81</u>, I was employed by Union Steel Inc., ("Union Steel") in Albion, Michigan.
- 3. I have personal knowledge of the following facts and could testify to them if necessary.
- 4. As part of my duties at Union Steel, I carried out Union Steel's wishes concerning disposal of wastes of all types, including liquid and industrial wastes.
- 5. All Union Steel wastes that may have been disposed of by Seiler Tank Truck Services Inc., were disposed of in sites selected by Union Steel Inc. On behalf of Union Steel, I directed Seiler Tank Truck Services, Inc. to dispose of Union Steel wastes at sites selected by Union Steel.

## FURTHER AFFIANT SAYETH NOT.

Subscribed and sworn to before me on <u>August 15</u>, 1991.

Patricia E. Worden

Notary Public

Calhoun County, Michigan
My Commission Expires: January 24, 1995

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